

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE AUTOMOTIVE PARTS ANTITRUST
LITIGATION

Master File No. 12-MD-02311
HON. MARIANNE O. BATTANI

In Re: ALL AUTO PARTS CASES

THIS DOCUMENT RELATES TO:
ALL AUTO PARTS CASES

**DECLARATION OF JUSTINA SESSIONS IN SUPPORT OF NON-PARTY HONDA'S
OBJECTIONS TO SPECIAL MASTER'S ORDER
REGARDING HONDA DISCOVERY DATED JANUARY 19, 2017 (D.I. 1607)**

Daniel Purcell
Justina Sessions
Ian Kanig
KEKER & VAN NEST LLP
633 Battery Street
San Francisco, CA 94111-1809
Telephone: 415 391 5400
Facsimile: 415 397 7188
dpurcell@kvn.com
jsessions@kvn.com
ikanig@kvn.com

DECLARATION OF JUSTINA K. SESSIONS

I Justina K. Sessions declare under penalty of perjury as follows.

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Keker & Van Nest LLP, located at 633 Battery Street, San Francisco, California 94111, counsel for Honda with respect to the subpoenas and motions to compel served in the above-referenced action. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, I could do so competently under oath.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of the deposition of Mark Willoughby, taken November 3, 2016.

3. Attached hereto as Exhibit B is an email from David Rowe to Special Master Esshaki regarding Proposed Orders re Honda, dated December 19, 2016.

4. Attached hereto as Exhibit C is a response email from Special Master Esshaki to Justina Sessions and David Rowe regarding Proposed Orders re Honda, dated December 28, 2016.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States.

Dated: February 2, 2017

By: /s/ Justina K. Sessions
JUSTINA K. SESSIONS